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January 4, 2023

**VIA ECF**

The Honorable John R. Tunheim  
Judge, District of Minnesota  
United States District Court  
300 South Fourth Street  
Minneapolis, MN 55415

***Re: Varela v. State Farm Mutual Automobile Insurance Company, Case No. 22-cv-00970-JRT-ECW (D. Minn.)***

Dear Judge Tunheim:

With permission from chambers, Plaintiff Yasmin Varela hereby submits this letter with Attachment A as supplemental authority in relation to Plaintiff's Memorandum of Law in Opposition to Defendant State Farm Mutual Automobile Insurance Company's Motion to Dismiss (ECF No. 24), which was argued before the Court on December 14, 2022. *See* ECF No. 35. Attachment A contains the Paperless Order and transcript for the motion to dismiss order ruling in *Hanley v. State Farm Mutual Auto. Ins. Co.*, Case No. 1:22-cv-00809-JRR (D. Md. Dec. 21, 2022), in which the Honorable Judge Julie R. Rubin denied State Farm's motion to dismiss in its entirety in a case involving a "typical negotiation reduction" for total loss claims and the plaintiff pleaded breach of contract and declaratory and injunctive relief claims. Plaintiff respectfully submits that this case provides relevant supplemental authority for this Court's pending motion.

Plaintiff Varela consulted with Defendant State Farm in the *Hanley* case and confirmed that no redactions of the transcript would be sought and that the transcript could be filed publicly. Please let us know if the Court has any questions.

Respectfully,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

*/s/Kate M. Baxter-Kauf*

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